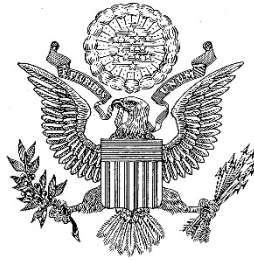


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May 31, 2023

Hon. Brenda K. Sannes  
Chief United States District Judge  
James M. Hanley Federal Building  
100 S. Clinton St.  
Syracuse, NY 13261

**RE: United States v. Joseph Morelli**  
**Case No.: 22-CR-115 (BKS)**

Dear Judge Sannes:

Mr. Morelli is currently scheduled to be sentenced on July 7, 2023, with sentencing memoranda due June 16, 2023. Pursuant to the guideline order, sentencing memoranda are not to exceed ten pages. I am writing to request an additional ten pages for our sentencing memo. The additional pages are needed because I expect there to be unresolved objections to the guideline calculations contained in the PSR, in addition to the need to fully explain the nature of the offense and Mr. Morelli's background and characteristics. This background will provide context to the Court and will allow Mr. Morelli's story to be told fully. This will ensure that the Court can thoroughly consider the necessary factors when imposing a sentence.

Thank you,

Gabrielle DiBella  
Asst. Federal Public Defender